

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

DANIELLE ROSENFELD and VINCENT
GARCIA on behalf of themselves and all others
similarly situated,

Plaintiffs,

18 CV 6720 (NGG) (PK)

-against-

TARA LENICH; CITY OF NEW YORK;
LUSHAWN M. THOMPSON, AS
ADMINISTRATOR OF THE ESTATE OF
KENNETH P THOMPSON; ERIC GONZALEZ;
MARK FELDMAN; WILLIAM SCHAEFFER;
BRIAN DONOHUE; WILLIAM POWER;
MICHAEL DOWLING; JOSEPH PIRAINO; AND
ROBERT KENAVAN,

Defendants.

DECLARATION OF DANA BOUB

I, Dana Boub, hereby affirm and state as follows:

1. I am a project manager for RG/2 Claims Administration LLC (“RG/2 Claims”), whose address is 30 South 17th Street, Philadelphia, PA 19103. I am over the age of 18, have personal knowledge of the matters set forth herein, and if called upon to do so, could testify competently to them.

2. RG/2 Claims is a full service class action settlement administrator offering notice, claims processing, allocation, distribution, tax reporting, and class action settlement consulting services. RG/2 Claims’ experience includes the provision of notice and administration services for settlements arising from antitrust, consumer fraud, civil rights, employment, negligent

disclosure, and securities fraud allegations. Since 2000, RG/2 Claims has administered and distributed in excess of \$1.2 billion in class action settlement proceeds.

3. RG/2 Claims was retained to, among other tasks, a) skip-trace phone numbers to obtain addresses for potential Class Members, b) prepare, print and mail Notices to all potential Class Members; c) receive and process completed Claim Forms; d) prepare weekly activity reports for Class Counsel; e) handle inquiries from and correspondence to Settlement Class Members; f) re-mail Notices; g) skip-trace undeliverable addresses; h) calculate and issue Settlement payments to valid Claimants; and i) conduct such other tasks as the Parties mutually agree or the Court orders RG/2 Claims to perform.

4. As of the date of this declaration, RG/2 Claims has received 162 valid claim forms, with a maximum award total of \$1,286,500, including the anticipated service awards of \$15,000 to each Named Plaintiff.

- a. 54 Claims were filed with 1 interception for a Maximum Award of \$6,000.
- b. 70 Claims were filed with between 2-10 interceptions for a Maximum Award of \$7,500.
- c. 32 Claims were filed with between 11-100 interceptions for a Maximum Award of \$10,000.
- d. 6 Claims were filed with between 101+ interceptions for a Maximum Award of \$15,000.

5. The deadline for all Class Members to submit claim forms has now passed.

6. Using the formula set out in the Settlement Agreement, RG/2 Claims has calculated that, based on the timely claim forms submitted, each Award Unit will have a value of \$1,000.

7. The valid claims filed by Class Members will be eligible for a total award of \$1,286,500, including the anticipated service awards of \$15,000 to each Named Plaintiff.

8. As of the date of this declaration, RG/2 Claims has received zero exclusions or objections for the Settlement.

I declare under penalty of perjury under the laws of the United States that to the best of my knowledge the foregoing is true and correct.

Executed on September 20, 2021 at Philadelphia, Pennsylvania.

A handwritten signature in black ink, appearing to read "Dana Boub", is written over a solid black horizontal line.

Dana Boub